

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

THE ESTATE OF YARON UNGAR,)
et al)
)
v.) C.A. No. 00-105L
)
THE PALESTINIAN AUTHORITY,)
et al)
)
)

**DEFENDANTS' MOTION FOR LEAVE TO ASSERT DEFENSES
IN SUPPORT OF THEIR PENDING MOTION TO DISMISS THE AMENDED
COMPLAINT OR ALTERNATIVELY FOR CERTIFICATION OF AN
INTERLOCUTORY APPEAL**

Defendants The Palestinian Authority (PA) and the Palestine Liberation Organization (PLO) by their counsel respectfully move for leave to assert two defenses which defendants' counsel submit follow from Palestine's status as a state under U.S. and international law. The defenses are that the dismissal of this action is required under 18 U.S.C. sec. 2337(2) and on grounds of sovereign immunity.

A Memorandum is submitted in support of this Motion.

Dated: January 30, 2002

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The PLO

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of January, 2002, I mailed a copy of the within Motion by first class mail, postage prepaid, to David J. Strachman, Esq., Skolnik, McIntyre & Tate Esqs., Ltd., Suite 400, 321 South Main Street, Providence, RI 02903 and Nitsana Darshan-Leitner, Esq., 28 Emek Ayalon Street, Modi'in 71770, Israel.

David J. Strachman